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April 21, 2023

**By ECF**

Hon. Naomi Reice Buchwald  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Leslie, et al. v. City of New York, et al., 22-cv-02305

Dear Judge Buchwald:

On behalf of the plaintiffs, I write to request a one-week extension of the deadline to provide their position on whether they can defer their motion for class certification to follow summary judgment and, if not, why they need to move now. *See* ECF No. 75. The defendants consent to this request. As mentioned during the last conference, the defendants had previously informed the plaintiffs that, given the plaintiffs' plan to imminently move for class certification, it would be helpful to have a decision on that motion to inform the appropriate scope of discovery. After reviewing the defendants' answer, the plaintiffs proposed a stipulation for the scope of discovery based on the admissions and statements in their answer. The plaintiffs' proposed stipulation would defer their motion for class certification until after summary judgment. The defendants are still considering the plaintiffs' proposal, but the parties expect that by next Friday they can inform the Court whether they have reached agreement. If the parties have not reached agreement, the plaintiffs will write to the Court to explain their position on the necessity and timing for class certification.

Respectfully submitted,

s/ Philip Desgranges

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